

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

**ADM Milling Co.
614 West 2nd Street
Mt. Vernon, Indiana 47620**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F129-12952-00012	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 19, 2002 Expiration Date: February 19, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wheat milling plant.

Authorized Individual:	General Manager
Source Address:	614 West 2 nd Street, Mt. Vernon, Indiana 47620
Mailing Address:	614 West 2 nd Street, Mt. Vernon, Indiana 47620
SIC Code:	2041
Source Location Status:	Posey
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

The grain mill line, consisting of:

- (a) One (1) truck receiving pit, identified as ES1, with maximum unit capacity of 120 tons per hour, with emissions controlled by a baghouse and exhausting through stack 1.
- (b) One (1) B Elevator, identified as ES4, with maximum unit capacity of 240 tons per hour, with emissions controlled by a baghouse and exhausting through stacks 2 and 3.
- (c) One (1) A Elevator, identified as ES6, with maximum unit capacity of 300 tons per hour, with emissions controlled by a baghouse and exhausting through stack 4.
- (d) One (1) wheat cleaning house, identified as ES7, with maximum cleaning capacity of 45.9 tons per hour, with emissions controlled by three (3) baghouses and exhausting through stacks 5, 6 and 7.
- (e) One (1) A Mill, identified as ES8, with maximum unit capacity of 14.38 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 8 and 9.
- (f) One (1) B Mill, identified as ES9, with maximum unit capacity of 14.38 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 10 and 11.
- (g) One (1) C Mill, identified as ES10, with maximum unit capacity of 15.81 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 12, 13, 14, 15, 16, and 17.

- (h) One (1) Germ Classifier, identified as ES11, with maximum unit capacity of 0.08 tons per hour, with emissions controlled by a baghouse and exhausting through stack 18.
- (i) One (1) Bulk Plant, identified as ES12, with maximum unit capacity of 54 tons per hour, with emissions controlled by four baghouses and exhausting at stacks 19, 20, 21, and 22.
- (j) One (1) Packing House Steam Dryer, identified as ES14, with maximum unit capacity of 35 tons per hour, with emissions controlled by a baghouse and exhausting through stack 24.
- (k) One (1) Flour Bagging Process, identified as ES16, with maximum unit capacity of 32.29 tons per hour, with emissions controlled by a baghouse and exhausting through stack 26.
- (l) One (1) Hammermill and Dirt Filter, identified as ES17, with maximum unit capacity of 12.72 tons per hour, with emissions controlled by two baghouses and exhausting at stacks 27 and 28.
- (m) One (1) Feed Bin Area, identified as ES18, with maximum unit capacity of 12.72 tons per hour, with emissions controlled by a baghouse and exhausting through stack 29.
- (n) One (1) Truck Feed Loadout Area, identified as ES19, with maximum unit capacity of 28 tons per hour, with emissions controlled by a baghouse and exhausting through stack 30.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - 1) Two (2) natural gas fired boilers, identified as boiler No. 1 & 2, and each rated at 5.2 and 4.2 MMBtu/hr, respectively. Boiler No. 1, installed in 1966 serves as a primary boiler, and boiler No. 2, installed in 1974 serves as a backup unit.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,300 gallons per month.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) A laboratory as defined in 326 IAC 2-7(20)(c).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Telephone No.: 812-436-2570 (IDEM Southwest Regional Office)
Facsimile No.: 812-436-2572 (IDEM Southwest Regional Office)

Failure to notify IDEM, OAQ, and the IDEM Southwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ , in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The grain mill line, consisting of:

- (a) One (1) truck receiving pit, identified as ES1, with maximum unit capacity of 120 tons per hour, with emissions controlled by a baghouse and exhausting through stack 1.
- (b) One (1) B Elevator, identified as ES4, with maximum unit capacity of 240 tons per hour, with emissions controlled by a baghouse and exhausting through stacks 2 and 3.
- (c) One (1) A Elevator, identified as ES6, with maximum unit capacity of 300 tons per hour, with emissions controlled by a baghouse and exhausting through stack 4.
- (d) One (1) wheat cleaning house, identified as ES7, with maximum cleaning capacity of 45.9 tons per hour, with emissions controlled by three (3) baghouses and exhausting through stacks 5, 6 and 7.
- (e) One (1) A Mill, identified as ES8, with maximum unit capacity of 14.38 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 8 and 9.
- (f) One (1) B Mill, identified as ES9, with maximum unit capacity of 14.38 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 10 and 11.
- (g) One (1) C Mill, identified as ES10, with maximum unit capacity of 15.81 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 12, 13, 14, 15, 16, and 17.
- (h) One (1) Germ Classifier, identified as ES11, with maximum unit capacity of 0.08 tons per hour, with emissions controlled by a baghouse and exhausting through stack 18.
- (i) One (1) Bulk Plant, identified as ES12, with maximum unit capacity of 54 tons per hour, with emissions controlled by four baghouses and exhausting at stacks 19, 20, 21, and 22.
- (j) One (1) Packing House Steam Dryer, identified as ES14, with maximum unit capacity of 35 tons per hour, with emissions controlled by a baghouse and exhausting through stack 24.
- (k) One (1) Flour Bagging Process, identified as ES16, with maximum unit capacity of 32.29 tons per hour, with emissions controlled by a baghouse and exhausting through stack 26.
- (l) One (1) Hammermill and Dirt Filter, identified as ES17, with maximum unit capacity of 12.72 tons per hour, with emissions controlled by two baghouses and exhausting at stacks 27 and 28.
- (m) One (1) Feed Bin Area, identified as ES18, with maximum unit capacity of 12.72 tons per hour, with emissions controlled by a baghouse and exhausting through stack 29.
- (n) One (1) Truck Feed Loadout Area, identified as ES19, with maximum unit capacity of 28 tons per hour, with emissions controlled by a baghouse and exhausting through stack 30.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate emissions from the following facilities shall be limited as follows:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions from 326 IAC 6-3-2 (lb/hr)	Limited PM Emissions (lb/hr)
ES1 (Truck Receiving Pit)	44.56	43.51	1.28
ES4 (B Elevator)	44.56	43.51	0.87
ES6 (A Elevator)	44.56	43.51	0.35
ES7 (Wheat Cleaning)	44.56	43.51	3.21
ES8 (A Mill)	14.38	24.46	2.85
ES9 (B Mill)	14.38	24.46	2.92
ES10 (C Mill)	15.81	26.06	5.17
ES11 (Germ Classifier)	0.034 ⁽¹⁾	0.551	0.73
ES12 (Bulk Plant)	32.29	40.60	0.94
ES14 (Packing House Steam Dryer)	32.29	40.60	0.63
ES16 (Flour Bagging Process)	32.29	40.60	1.16
ES17 (Hammermill/Dirt Filter)	12.72	22.53	1.96
ES18 (Feed Storage Bins)	12.72	22.53	0.16
ES19 (Truck Feed Loadout Area)	12.72	22.53	0.09

1) Pursuant to 326 IAC 6-3-2(c), allowable PM for processes with a process weight rate of equal to or less than 100 lb/hr are limited to 0.551 lbs/hr.

D.1.2 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the source shall limit facility PM10 emissions as follows:

Emission Unit	Process Weight Rate (ton/hr)	Limited PM-10 Emissions (lb/hr)	Limited Emission Factor (lb/ton)
ES1 (Truck Receiving Pit)	120	1.28	0.0107
ES4 (B Elevator)	240	0.87	0.0036
ES6 (A Elevator)	300	0.35	0.0011
ES7 (Wheat Cleaning), Stack 5	45.9	0.98	0.0213
ES7 (Wheat Cleaning), Stack 6	45.9	0.98	0.0213
ES7 (Wheat Cleaning), Stack 7	45.9	1.25	0.0272
ES8 (A Mill), Stack 8	14.38	1.77	0.1230
ES8 (A Mill), Stack 9	14.38	1.08	0.0751
ES9 (B Mill), Stack 10	14.38	1.77	0.1230
ES9 (B Mill), Stack 11	14.38	1.15	0.080
ES10 (C Mill), Stacks 12, 13, 14 & 15	15.81	2.78	0.1758
ES10 (C Mill), Stacks 15, 16 & 17	15.81	2.39	0.1511
ES11 (Germ Classifier)	0.08	0.73	9.125
ES12 (Bulk Plant), Stack 19	54.0	0.33	0.0061
ES12 (Bulk Plant), Stack 20	54.0	0.14	0.0026
ES12 (Bulk Plant), Stack 21	54.0	0.14	0.0026
ES12 (Bulk Plant), Stack 22	54.0	0.33	0.0061
ES14 (Packing House Steam Dryer)	35.0	0.63	0.0180
ES16 (Flour Bagging Process)	32.29	1.16	0.0360
ES17 (Hammermill/Dirt Filter), Stack 27	12.72	1.28	0.1008
ES17 (Hammermill/Dirt Filter), Stack 28	12.72	0.68	0.053
ES18 (Feed Storage Bins)	12.72	0.16	0.0125
ES19 (Truck Feed Loadout Area)	28.0	0.09	0.0032

Compliance with this condition shall limit the source-wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) shall not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control devices.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM and PM-10)

In order to comply with conditions D.1.1 and D.1.2, the baghouses for PM and PM-10 control shall be in operation and control emissions from facilities ES1, ES4, ES6, ES7, ES8, ES9, ES10, ES11, ES12, ES14, ES16, ES17, ES18, and ES19 at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse stack exhausts (1 through 30) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across each of the baghouses used in conjunction with the grain mill line, at least once per shift when the grain mill line is in operation when venting to the atmosphere. When for any one reading, the pressure drop across each of the baghouse is outside the normal range of 1.0 and 7.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grain mill line when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the baghouse stack exhausts (1 through 30) once per shift.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: (Insignificant Activity)

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - 1) Two (2) natural gas fired boilers, identified as boiler No. 1 & 2, and each rated at 5.2 and 4.2 MMBtu/hr, respectively. Boiler No. 1, installed in 1966 serves as a primary boiler, and boiler No. 2, installed in 1974 serves as a backup unit.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,300 gallons per month.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-2-3(d) (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from one (1) natural gas fired boiler, identified as boiler No. 1, constructed before 1972, and rated at 5.2 mmBtu/hr, shall be limited to 0.8 lbs PM/mmBtu.
- (b) Pursuant to 326 IAC 6-2-3(e) (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from one (1) natural gas fired boiler, identified boiler No. 2, constructed after 1972, and rated at 4.2 mmBtu/hr, shall be limited to 0.6 lbs PM/mmBtu.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-6, 326 IAC 8-4-9]

Any change or modification which may increase monthly gasoline throughput to ten thousand (10,500) gallons or more from the gasoline fuel transfer and dispensing operation shall require approval from IDEM, OAQ, prior to making the change.

Compliance Determination Requirement

There are no specific compliance determination requirements applicable to these facilities.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific compliance monitoring requirements applicable to these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.3 Record Keeping Requirement

To document compliance with Condition D.2.2, the Permittee shall maintain records of total monthly gasoline throughput at the transfer and dispensing station. These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

There are no specific reporting requirements applicable to these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: ADM Milling Co.
Source Address: 614 West 2nd Street, Mt. Vernon, Indiana 47620
Mailing Address: 614 West 2nd Street, Mt. Vernon, Indiana 47620
FESOP No.: F129-12952-00012

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: ADM Milling Co.
Source Address: 614 West 2nd Street, Mt. Vernon, Indiana 47620
Mailing Address: 614 West 2nd Street, Mt. Vernon, Indiana 47620
FESOP No.: F129-12952-00012

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ADM Milling Co.
Source Address: 614 West 2nd Street, Mt. Vernon, Indiana 47620
Mailing Address: 614 West 2nd Street, Mt. Vernon, Indiana 47620
FESOP No.: F129-12952-00012

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: ADM Milling Co.
Source Location: 614 West 2nd Street, Mt. Vernon, Indiana 47620
SIC Code: 2041
County: Posey
Operation Permit No.: F129-12952-00012
Permit Reviewer: Adeel Yousuf /EVP

On November 14, 2001, the Office of Air Quality (OAQ) had a notice published in the Mount Vernon Democrat in Mount Vernon, Indiana, stating that ADM Milling Co. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary wheat mill. The notice also stated that OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On January 29, 2002, Phil Gordon of ADM milling Co. submitted a comment on the proposed FESOP renewal permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Section A.1 General Information:

Change the name of the authorized individual to "general manager", instead of "Philip G. Stinemetz".

Response 1

The following change has been made to Section A.1.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wheat milling plant.

Authorized Individual:	Philip G. Stinemetz General Manager
Source Address:	614 West 2 nd Street, Mt. Vernon, Indiana 47620
Mailing Address:	614 West 2 nd Street, Mt. Vernon, Indiana 47620
SIC Code:	2041
Source Location Status:	Posey
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules;
	Minor Source, Section 112 of the Clean Air Act

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Condition C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
Condition C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
Condition C.5 Fugitive Dust Emissions [326 IAC 6-4]
Condition C.7 Stack Height [326 IAC 1-7]

Conditions C.3, C.4, C.5 and C.7 were modified by removing language stating that the condition was not federally enforceable. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable, therefore, the following statements with a strike out have been removed from the FESOP permit.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. ~~The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

2. Condition B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

3. Condition C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M] Condition C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

IDEM, OAQ has revised C.8 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has revised C.16 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

4. C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

The IDEM, OAQ has restructured C.15 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications.

C.15 Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

- ~~_____ (1) This condition;~~
- ~~_____ (2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~_____ (3) The Compliance Monitoring Requirements in Section D of this permit;~~

- ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) ~~A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. ~~A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the~~ **Permittee, supplemented from time to time by the Permittee, and** maintained on site, and ~~is~~ comprised of:
- ~~(A)(1)~~ **(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and an~~ **expected timeframe for taking reasonable response steps.**
- ~~(B)~~ ~~A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
- (4) Failure to take reasonable response steps shall constitute a violation of the permit.**

- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The Permittee is excused from taking not required to take any** further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment **and This shall be an excuse from taking further response steps providing that** prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ **Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)(f)~~ **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.**
- (f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

5. D.1.6 Parametric Monitoring

Condition D.1.6 has been revised to clarify the facility specific events that would not qualify as a deviation.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across each of the baghouses used in conjunction with the grain mill line, at least once per shift when the grain mill line is in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading,** the pressure drop across each of the baghouse ~~shall be maintained within~~ **is outside** the normal range of 1.0 and 7.0 inches of water or a range established during the latest stack test. ~~The , the~~ **Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.** ~~for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring Response Plan - Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports,** shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

6. Conditions D.1.5 and D.1.8 have been revised to reflect the Condition C.15 title change.

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse stack exhausts (1 through 30) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring Response Plan -~~ **Preparation, Implementation, Records and Reports,** shall be considered a violation of this permit.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

7. Condition A.5 Prior Permit Conditions

Condition A.5 Prior Permit Conditions was removed and a new Condition Prior Permit Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

A.5 ~~Prior Permit Conditions~~

- ~~(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.~~
- ~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.~~

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: ADM Milling Co.
Source Location: 614 West 2nd Street, Mt. Vernon, Indiana 47620
County: Posey
SIC Code: 2041
Operation Permit No.: F129-12952-00012
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from ADM Milling Co. relating to the operation of a stationary wheat mill. ADM Milling Co. was issued FESOP 129-5688-00012 on December 6, 1996 that will expire on December 6, 2001.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

The grain mill line, consisting of:

- (a) One (1) truck receiving pit, identified as ES1, with maximum unit capacity of 120 tons per hour, with emissions controlled by a baghouse and exhausting through stack 1.
- (b) One (1) B Elevator, identified as ES4, with maximum unit capacity of 240 tons per hour, with emissions controlled by a baghouse and exhausting through stacks 2 and 3.
- (c) One (1) A Elevator, identified as ES6, with maximum unit capacity of 300 tons per hour, with emissions controlled by a baghouse and exhausting through stack 4.
- (d) One (1) wheat cleaning house, identified as ES7, with maximum cleaning capacity of 45.9 tons per hour, with emissions controlled by three (3) baghouses and exhausting through stacks 5, 6 and 7.
- (e) One (1) A Mill, identified as ES8, with maximum unit capacity of 14.38 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 8 and 9.
- (f) One (1) B Mill, identified as ES9, with maximum unit capacity of 14.38 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 10 and 11.
- (g) One (1) C Mill, identified as ES10, with maximum unit capacity of 15.81 tons per hour, with emissions controlled by two baghouses and exhausting through stacks 12, 13, 14, 15, 16, and 17.
- (h) One (1) Germ Classifier, identified as ES11, with maximum unit capacity of 0.08 tons per hour, with emissions controlled by a baghouse and exhausting through stack 18.

- (i) One (1) Bulk Plant, identified as ES12, with maximum unit capacity of 54 tons per hour, with emissions controlled by four baghouses and exhausting at stacks 19, 20, 21, and 22.
- (j) One (1) Packing House Steam Dryer, identified as ES14, with maximum unit capacity of 35 tons per hour, with emissions controlled by a baghouse and exhausting through stack 24.
- (k) One (1) Flour Bagging Process, identified as ES16, with maximum unit capacity of 32.29 tons per hour, with emissions controlled by a baghouse and exhausting through stack 26.
- (l) One (1) Hammermill and Dirt Filter, identified as ES17, with maximum unit capacity of 12.72 tons per hour, with emissions controlled by two baghouses and exhausting at stacks 27 and 28.
- (m) One (1) Feed Bin Area, identified as ES18, with maximum unit capacity of 12.72 tons per hour, with emissions controlled by a baghouse and exhausting through stack 29.
- (n) One (1) Truck Feed Loadout Area, identified as ES19, with maximum unit capacity of 28 tons per hour, with emissions controlled by a baghouse and exhausting through stack 30.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - 1) Two (2) natural gas fired boilers, identified as boiler No. 1 & 2, and each rated at 5.2 and 4.2 MMBtu/hr, respectively. Boiler No. 1, installed in 1966, serves as a primary boiler, and boiler No. 2, installed in 1974, serves as a backup unit.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,300 gallons per month.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) A laboratory as defined in 326 IAC 2-7(20)(c).

Existing Approvals

- (a) FESOP 129-5688-00012, issued on December 6, 1996; and expires on December 6, 2001;
- (b) First Administrative Amendment (129-8795-00012), issued on August 5, 1997.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on November 4, 2000. Additional information was received on October 12, 2001

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (five (5) pages)

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	17,826.84
PM-10	17,797.46
SO ₂	0.01
VOC	0.13
CO	1.91
NO _x	2.28

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 6, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F129-5688-00012; issued on December 6, 1996).

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
ES1 (Truck Receiving Pit) ⁽²⁾	5.60	5.60	-	-	-	-	-
ES4 (B Elevator) ⁽²⁾	3.80	3.80	-	-	-	-	-
ES6 (A Elevator) ⁽²⁾	1.56	1.56	-	-	-	-	-
ES7 (Wheat Cleaning) ⁽²⁾	14.07	14.07	-	-	-	-	-
ES8 (A Mill) ⁽²⁾	12.51	12.51	-	-	-	-	-
ES9 (B Mill) ⁽²⁾	12.79	12.79	-	-	-	-	-
ES10 (C Mill) ⁽²⁾	22.62	22.62	-	-	-	-	-
ES11 (Germ Classifier) ⁽²⁾	3.22	3.22	-	-	-	-	-
ES12 (Bulk Plant) ⁽²⁾	4.12	4.12	-	-	-	-	-
ES14 (Packing House Steam Dryer) ⁽²⁾	2.76	2.76	-	-	-	-	-
ES16 (Flour Bagging Process) ⁽²⁾	5.08	5.08	-	-	-	-	-
ES17 (Hammermill/Dirt Filter) ⁽²⁾	8.62	8.62	-	-	-	-	-
ES18 (Feed Storage Bins) ⁽²⁾	0.70	0.70	-	-	-	-	-
ES19 (Truck Feed Loadout Area) ⁽²⁾	0.41	0.41	-	-	-	-	-
Insignificant Activities	0.08	0.31	0.01	2.28	0.13	1.91	negl.
Total PTE After Issuance	97.94	98.17	0.01	2.28	0.13	1.91	negl.

Note:

- Pursuant to 326 IAC 2-8, the source wide PM10 emissions from the above listed facilities shall be controlled to less than 100 tons/yr by using baghouses as control. Therefore, the requirements of 326 IAC 2-7 do not apply. PM-10 emissions are conservatively set equal to PM emissions except for PM/PM10 emissions for boilers.
- Following equation was used to determine the PM and PM-10 allowable emissions from each of the facilities based on sourcewide limit of 98 TPY:

$$\text{Facility Allowable Emissions} = \frac{\text{Facility Potential Controlled Emissions} \times \text{Source Limit (98.0)}}{\text{Source Potential Controlled Emissions}}$$

County Attainment Status

The source is located in Posey County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Posey County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

There are no new federal rules applicable to the source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for the original FESOP F129-5688-00012, issued on December 6, 1996.

- (a) Grain elevators and milling units at this facility are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.300, Subpart DD) because the facilities were constructed prior to the rule applicability date of August 3, 1978.
- (b) Two (2) boilers (No. 1 & 2) constructed in 1966 and 1974, each rated at 5.2 and 4.2 MMBtu per hour, respectively, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because each boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.
- (c) The insignificant activities identified as "a petroleum fuel, other than gasoline, dispensing facility with storage capacity less than or equal to 10,500 gallons" and "a gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons" are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively) since the storage capacities associated with these activities are below the minimum applicable threshold to the three rules (i.e., 40 cubic meters (10,568 gallons)).
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61, and 326 IAC 20 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

There are no new state rules applicable to the entire source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for the original FESOP F129-5036-00021, issued on December 11, 1996.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not a major source under 326 IAC 2-2 (PSD) because the potential to emit for any regulated pollutant is limited to less than 250 tons per year, and it is not one of the twenty-eight (28) listed sources. PM emissions from the facilities ES1, ES4, ES6, ES7, ES8, ES9, ES10, ES11, ES12, ES14, ES16, ES17, ES18, and ES19 shall be limited to less than 250 tons per year by using baghouses for PM control, and therefore, the requirements of 326 IAC 2-2 shall not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the source shall limit facility PM-10 emissions as follows:

Emission Unit	Process Weight Rate (ton/hr)	Limited PM-10 Emissions (lb/hr)	Limited Emission Factor (lb/ton) ⁽⁴⁾
ES1 (Truck Receiving Pit)	120	1.28	0.0107
ES4 (B Elevator)	240	0.87	0.0036
ES6 (A Elevator)	300	0.35	0.0011
ES7 (Wheat Cleaning), Stack 5	45.9	0.98	0.0213
ES7 (Wheat Cleaning), Stack 6	45.9	0.98	0.0213
ES7 (Wheat Cleaning), Stack 7	45.9	1.25	0.0272
ES8 (A Mill), Stack 8	14.38	1.77	0.1230
ES8 (A Mill), Stack 9	14.38	1.08	0.0751
ES9 (B Mill), Stack 10	14.38	1.77	0.1230
ES9 (B Mill), Stack 11	14.38	1.15	0.080
ES10 (C Mill), Stacks 12, 13, 14 & 15	15.81	2.78	0.1758
ES10 (C Mill), Stacks 15, 16 & 17	15.81	2.39	0.1511
ES11 (Germ Classifier)	0.08	0.73	9.125
ES12 (Bulk Plant), Stack 19	54.0	0.33	0.0061
ES12 (Bulk Plant), Stack 20	54.0	0.14	0.0026
ES12 (Bulk Plant), Stack 21	54.0	0.14	0.0026
ES12 (Bulk Plant), Stack 22	54.0	0.33	0.0061
ES14 (Packing House Steam Dryer)	35.0	0.63	0.0180
ES16 (Flour Bagging Process)	32.29	1.16	0.0360
ES17 (Hammermill/Dirt Filter), Stack 27	12.72	1.28	0.1008
ES17 (Hammermill/Dirt Filter), Stack 28	12.72	0.68	0.053
ES18 (Feed Storage Bins)	12.72	0.16	0.0125
ES19 (Truck Feed Loadout Area)	28.0	0.09	0.0032

1) Following equation was used to determine the PM and PM-10 allowable emissions from each of the facilities based on sourcewide limit of 98 TPY:

$$\text{Facility Allowable Emissions} = \frac{\text{Facility Potential Controlled Emissions}}{\text{Source Potential Controlled Emissions}} \times \text{Source Limit (< 98.0)}$$

2) PM-10 emissions are controlled by baghouses with control efficiency of 99.50%.

3) PM-10 emissions are controlled by baghouses with control efficiency of 99.90%

4) Emission factor is calculated based on dividing PM-10 emission (lb/hr) by Process weight rate (ton/hr).

Compliance with these limits shall limit the sourcewide potential to emit PM10 to less than 100 tons per twelve (12) consecutive month period and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. In order to comply with this limit, ADM Milling shall use control equipment (baghouses) at all times when particulate matter emitting facilities are in operation.

326 IAC 2-6 (Emission Reporting)

This source is located in Posey County which is not one of the specifically listed counties, nor does the source have the potential to emit CO, VOC, NOx, PM10 (including fugitive emissions), or SO₂ in amounts at or exceeding 100 tons per year. The potential to emit of all other regulated pollutants is less than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) natural gas fired boilers identified as boilers No. 1 and 2, (both constructed before 1983), each rated at 5.2 and 4.2 MMBtu/hr, respectively, are subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, particulate emissions from indirect heating facilities constructed prior to September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

- C = 50 u/m³
- Pt = emission rate limit (lbs/MMBtu)
- Q = total source heat input capacity (MMBtu/hr)
- N = number of stacks
- a = plume rise factor (0.67)
- h = stack height in feet. If a number of stacks of different heights exist, average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times p_{a_i} \times Q_i}{\sum_{i=1}^N p_{a_i} \times Q_i}$$

where: P_a = the actual controlled emissions rate in lb/MMBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For boiler No. 1 constructed before 1972 ($Q = 5.2$ MMBtu/hr):

$$P_t = (50 \times 0.67 \times 30) / (76.5 \times 5.2^{0.75} \times 1^{0.25}) = 3.81 \text{ lbs PM/MMBtu}$$

However, per 326 IAC 6-2-3(d), P_t for indirect heating facilities constructed before 1972 shall not exceed 0.8 lbs PM/MMBtu, therefore boiler No. 1 is limited to 0.8 lbs PM/MMBtu.

compliance calculation:

$$\text{Potential PM emissions} = 1.9 \text{ lb PM/MMCF} \times (1/1000) \text{ (MMCF/MMBtu)} = 0.0019 \text{ lbs PM/MMBtu.}$$

Potential PM emissions for boiler No. 1 (0.0019 lbs PM/MMBtu) are less than the allowable 0.8 lbs PM/MMBtu, therefore the boiler No. 1 will comply with the requirements of 326 IAC 6-2-3.

For boiler No. 2, constructed in 1974 ($Q = 5.2 + 4.2 = 9.4$ MMBtu/hr):

$$P_t = (50 \times 0.67 \times 30) / (76.5 \times 9.4^{0.75} \times 2^{0.25}) = 2.05 \text{ lbs PM/MMBtu}$$

Pursuant to 326 IAC 6-2-3(e), P_t for indirect heating facilities constructed after 1972 shall not exceed 0.6 lbs PM/MMBtu, therefore boiler No. 2 is limited to 0.6 lbs PM/MMBtu.

compliance calculation:

$$\text{Potential PM emissions} = 1.9 \text{ lb PM/MMCF} \times (1/1000) \text{ (MMCF/MMBtu)} = 0.0019 \text{ lbs PM/MMBtu.}$$

Potential PM emissions for boiler No. 2 (0.0019 lbs PM/MMBtu) are less than the allowable 0.6 lbs PM/MMBtu, therefore boiler No. 2 will comply with the requirements of 326 IAC 6-2-3.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), the particulate matter (PM) emissions from the following processes shall be limited by the following equations:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions from 326 IAC 6-3-2 (lb/hr)	Controlled PM Emissions (lb/hr) ⁽²⁾	Limited PM Emissions (lb/hr) ⁽³⁾
ES1 (Truck Receiving Pit)	44.56	43.51	0.041	1.28
ES4 (B Elevator)	44.56	43.51	0.013	0.87
ES6 (A Elevator)	44.56	43.51	0.013	0.35
ES7 (Wheat Cleaning)	44.56	43.51	0.0022	3.21
ES8 (A Mill)	14.38	24.46	0.690	2.85
ES9 (B Mill)	14.38	24.46	0.710	2.92
ES10 (C Mill)	15.81	26.06	1.253	5.17
ES11 (Germ Classifier)	0.034 ⁽¹⁾	0.551	0.178	0.73
ES12 (Bulk Plant)	32.29	40.60	0.230	0.94
ES14 (Packing House Steam Dryer)	32.29	40.60	0.155	0.63
ES16 (Flour Bagging Process)	32.29	40.60	0.283	1.16
ES17 (Hammermill/Dirt Filter)	12.72	22.53	0.479	1.96
ES18 (Feed Storage Bins)	12.72	22.53	0.038	0.16
ES19 (Truck Feed Loadout Area)	12.72	22.53	0.022	0.09
Total (lb/hr)				22.34

Note:

1) Pursuant to 326 IAC 6-3-2(c), allowable PM for processes with a process weight rate of equal to or less than 100 lb/hr are limited to 0.551 lbs/hr

2) PM (and PM-10) emissions are controlled by baghouses with minimum control efficiency of 99.5%.

3) PM emissions for these facilities are controlled by baghouses to less than 250 tons/yr and, therefore, the requirement of 326 IAC 2-2 (Prevention of Significant Deterioration) shall not apply.

The baghouses controlling facilities ES1, ES4, ES6, ES7, ES8, ES9, ES10, ES11, ES12, ES14, ES16, ES17, ES18, and ES19 shall be in operation at all times the facilities are in operation, in order to comply with this limit.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-1 (Applicability) and 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities), all petroleum liquid storage vessels (constructed in 1966 and 1974) with capacities greater than one hundred fifty thousand (150,000) liters (39,000 gallons) containing VOC whose true vapor pressure is greater than 10.5 kPa (1.52 psi) shall comply with the requirements for external fixed and floating roof tanks and the specified record keeping and reporting requirements. The insignificant activity identified as a petroleum fuel, other than gasoline, dispensing facility with storage capacity less than or equal to 10,500 gallons is not subject to the requirements of 326 IAC 8-4-3 since the storage tank capacity is below the 39,000 gallon threshold for rule applicability.

326 IAC 8-4-6 (Gasoline Dispensing Facilities) and 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems)

Pursuant to 326 IAC 8-4-1 (Applicability), the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), shall apply to any gasoline storage tank and dispensing facility, except dispensing facilities with a monthly throughput of less than ten thousand (10,000) gallons per month and that were in existence prior to July 1, 1989. As an insignificant activity, the gasoline fuel transfer and dispensing operation was in existence at the source prior to July 1, 1989; however, based on usage records, the actual maximum throughput at the source is well below the 10,000 gallons per month applicability threshold. Therefore, these requirements do not apply to the source and the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems) are likewise not applicable. The source shall maintain monthly records of the gasoline throughput at the dispensing facility and shall submit such records to OAQ upon request to demonstrate compliance with this determination.

Testing Requirements

Stack testing for all facilities at the source is not required because the particulate matter emissions are controlled by baghouses which require compliance monitoring and none of the facilities meet any of the criteria which would require a stack test.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP except the daily frequency of performing visible emission notations and recording of pressure drop readings has been changed to once per shift.

Reason changed: Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Baghouse failure can occur suddenly; therefore monitoring of baghouse operational parameters should be more frequently than weekly or even daily in such cases where a source operates more than one shift per day. The OAQ believes that changing visible emissions notations to once per operating shift is a reasonable requirement. Therefore, the requirements to perform visible emissions notations have been changed from weekly to once per shift. This change likewise applies to the pressure drop readings.

1. The grain milling line consisting of facilities ES1, ES4, ES6, ES7, ES8, ES9, ES10, ES11, ES12, ES14, ES16, ES17, ES18, and ES19 have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the facilities' baghouse stacks (1 through 30) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across each baghouse controlling each of the facilities, at least once per shift when the facility is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
 - (c) An inspection shall be performed each calendar quarter of all bags controlling the facilities when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

- (d) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (e) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for these facilities must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this grain milling plant shall be subject to the conditions of the attached proposed **FESOP No.: F129-12952-00012.**

Appendix A: Emission Calculations

Company Name: ADM Milling Co.
Address City IN Zip: 614 West 2nd St., Mt. Vernon, IN 47620
FESOP Renewal No.: 129-12952-00012
Reviewer: Adeel Yousuf / EVP
Date: October 12, 2001

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Receiving, A & B Elevator and Wheat Cleaning (a) Unit IDs: ES1, ES4, ES6 and ES7	Mills, Packing, Loadout, Storage Bins Emissions (b) Unit IDs: ES8 - E19	Insignificant Activities Boilers No. 1 & 2 *	TOTAL
PM	61.29	17.727.06	0.08	17788.43
PM10	36.50	17.727.06	0.31	17763.87
SO2	0.00	0.00	0.02	0.02
NOx	0.00	0.00	4.12	4.12
VOC	0.00	0.00	0.23	0.23
CO	0.00	0.00	3.46	3.46
total HAPs	0.00	0.00	negl.	negl.
worst case single HAP	0.00	0.00	negl.	negl.

Total emissions based on rated capacity at 8,760 hours/year.

a) Emission calculations based on AP-42 emission factors.

b) Emission calculations based on grain loading.

*One of the boiler serves as a back-up, emissions were evaluated for worst case highest rated boiler.

Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Receiving, A & B Elevator and Wheat Cleaning (a) Unit IDs: ES1, ES4, ES6 and ES7	Mills, Packing, Loadout, Storage Bins Emissions (b) Unit IDs: ES8 - E19	Insignificant Activities Boilers No. 1 & 2 *	TOTAL
PM	0.31	17.73	0.08	18.12
PM10	0.18	17.73	0.31	18.22
SO2	0.00	0.00	0.02	0.02
NOx	0.00	0.00	4.12	4.12
VOC	0.00	0.00	0.23	0.23
CO	0.00	0.00	3.46	3.46
total HAPs	0.00	0.00	negl.	negl.
worst case single HAP	0.00	0.00	negl.	negl.

Total emissions based on rated capacity at 8,760 hours/year.

a) Emission calculations based on AP-42 emission factors.

b) Emission calculations based on grain loading.

*One of the boiler serves as a back-up, emissions were evaluated for worst case highest rated boiler.

Appendix A: Process Particulate Emissions

Company Name: ADM Milling Co.
Address City IN Zip: 614 West 2nd St., Mt. Vernon, IN 47620
FESOP Renewal No.: 129-12952-00012
Reviewer: Adeel Yousuf / EVP
Date: October 8, 2001

PM-10 Emissions						
Emission Unit ID	Emission Unit Description	Control Device % Efficiency	Potential Process Rate (tons/yr)	Emission Factor (lb/ton)	Uncontrolled Potential Emissions (ton/yr)	Controlled Potential Emissions (ton/yr)
ES1	Truck Receiving Pit	99.50%	390368	0.0590 a	11.52	0.06
ES4	B Elevator	99.50%	390368	0.0340 b	6.64	0.03
ES6	A Elevator	99.50%	390368	0.0340 b	6.64	0.03
ES7	Wheat Cleaning	99.50%	390368	0.0600 c	11.71	0.06

Total Uncontrolled Potential Emissions (metric tons/yr):	36.50
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Total Controlled Potential Emissions (metric tons/yr):	0.18
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Notes:

- a) AP-42 Table 9.9.1-1, 5/98 (Assumed worst-case emission factor, straight truck grain receiving).
 b) AP-42 Table 9.9.1-1, 5/98 (headhouse and internal handling).
 c) AP-42 Table 9.9.1-2, 5/98 (cleaning house separators in wheat flour mills) (uncontrolled EF was calculated from cyclone controlled factor assuming a cyclone efficiency of 90%).

Methodology:

Uncontrolled Potential Emissions (tons/yr): Potential Process Rate (tons/yr) * EF (lb/ton) * 1 ton/2000lb

Controlled Potential Emissions (tons/yr): Potential Process Rate (tons/yr) * EF (lb/ton) * 1 ton/2000lb * (1 - control efficiency)

Appendix A: Process Particulate Emissions

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Company Name: ADM Milling Co.
Address City IN Zip: 614 West 2nd St., Mt. Vernon, IN 47620
FESOP Renewal No.: 129-12952-00012
Reviewer: Adeel Yousuf / EVP
Date: October 8, 2001

PM Emissions						
Emission Unit ID	Emission Unit Description	Control Device % Efficiency	Potential Process Rate (tons/yr)	Emission Factor (lb/ton)		Uncontrolled Potential Emissions (ton/yr)
						Controlled Potential Emissions (ton/yr)
ES1	Truck Receiving Pit	99.50%	390368	0.1800	a	35.13
ES4	B Elevator	99.50%	390368	0.0610	b	11.91
ES6	A Elevator	99.50%	390368	0.0610	b	11.91
ES7	Wheat Cleaning	99.50%	390368	0.0120	c	2.34

Total Uncontrolled Potential Emissions (metric tons/yr): 61.29

Total Controlled Potential Emissions (metric tons/yr): 0.31

Notes:

- a) AP-42 Table 9.9.1-1, 5/98 (Assumed worst-case emission factor, straight truck grain receiving).
- b) AP-42 Table 9.9.1-1, 5/98 (headhouse and internal handling).
- c) AP-42 Table 9.9.1-2, 5/98 (cleaning house separators in wheat flour mills) (uncontrolled EF was calculated from cyclone controlled factor assuming a cyclone efficiency of 90%.

Methodology:

Uncontrolled Potential Emissions (tons/yr): Potential Process Rate (tons/yr) * EF (lb/ton) * 1 ton/2000lb

Controlled Potential Emissions (tons/yr): Potential Process Rate (tons/yr) * EF (lb/ton) * 1 ton/2000lb * (1 - control efficiency)

Appendix A: Process Particulate Emissions

Page 4 of 5 TSD App A

Company Name: ADM Milling Co.
Address City IN Zip: 614 West 2nd St., Mt. Vernon, IN 47620
FESOP Renewal No.: 129-12952-00012
Reviewer: Adeel Yousuf / EVP
Date: October 8, 2001

PM and PM-10 Emissions						
Emission Unit ID	Emission Unit Description	Flowrate (acfm) (a)	Estimated Grain Loading (b) (gr/dscf)	Control Device % Efficiency	Uncontrolled Potential Emissions (ton/yr)	Controlled Potential Emissions (ton/yr)
ES8	A Mill	27018	0.003	99.90%	3043.00	3.04
ES9	B Mill	27588	0.003	99.90%	3107.20	3.11
ES10	C Mill	48764	0.003	99.90%	5492.22	5.49
ES11	Germ Classifier	6952	0.003	99.90%	782.99	0.78
ES12	Bulk Plant	9000	0.003	99.90%	1013.66	1.01
ES14	Packing House Steam Dryer	6004	0.003	99.90%	676.22	0.68
ES16	Flour Bagging Process	10982	0.003	99.90%	1236.89	1.24
ES17	Hammermill/Dirt Filter	18638	0.003	99.90%	2099.17	2.10
ES18	Feed Storage Bins	1518	0.003	99.90%	170.97	0.17
ES19	Truck Feed Loadout Area	930	0.003	99.90%	104.74	0.10

Total Uncontrolled Potential Emissions (tons/yr):	17727.06
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Total Controlled Potential Emissions (metric tons/yr):	17.73
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Notes:

- Values are total airflows for all of the baghouses at an emission source.
- Grain loading values in the baghouse exhaust, based on manufacturer's data.
- Assumed that the air exhausted through the socks is equal to the volume of flour loaded. Grain loading values are conservative estimates based on engineering judgement.
- Fugitive emissions from these sources are not included towards the total potential emissions according to 326 IAC 2-7-1.

Methodology:

Uncontrolled Potential Emissions (tons/yr) = Grain Loading (gr/dscf) x Air Flow (dscfm) x 60 (min/hr) x 1/7000 (lb/gr) x 1 ton / 2000 lb x 8760 hrs / 1 yr x (1 / 1 - Control Efficiency (%))

Controlled Potential Emissions (tons/yr) = Grain Loading (gr/dscf) x Air Flow (dscfm) x 60 (min/hr) x 1/7000 (lb/gr) x 1 ton / 2000 lb x 8760 hrs / 1 yr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boiler S-1 and Boiler S-2

Page 5 of 5 TSD App A

Company Name: ADM Milling Co.
Address City IN Zip: 614 West 2nd St., Mt. Vernon, IN 47620
FESOP Renewal No.: 129-12952-00012
Reviewer: Adeel Yousuf / EVP
Date: October 8, 2001

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

9.4

82.3

Two boilers, identified as Boiler no. 1 and 2, each rated at 5.2 and 4.2 MMBtu/hr.

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.08	0.31	0.02	4.12	0.23	3.46

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton